

United Bankruptcy Court
For The Eastern District of
Virginia, Richmond Division

Circuit City Stores, Inc et al.,
Chapter 11 Case No. 08-35653
(Fifty-Sixth Omnibus Objection)

RICHMOND DIVISION	
F I L E D	NOV 16 2009
CLERK U.S. BANKRUPTCY COURT	

Claimant: Thomas C. Bradley

In January of 2008, I was given a cash retention award valued at \$40,000.

I have already presented the supporting documents. In order to receive the award, I needed to

still be employed by Circuit City on January 1st, 2009. I stayed with the company until they released me on March 21st 2009. I stayed on until the last day as part of the liquidation team.

In reference to who has personal knowledge of relevant facts regarding this objection. As per Exhibit D included in the objection, Eric Jonas (Senior Vice president of Human Resources) approved this award. It was also Eric Jonas as well as the Senior leadership of Circuit City whom instructed us when to file these claims. They were not filed late as suggested in the objection.

The award states that a change of control, which includes liquidation, would be grounds for the liquidation to be paid in full within 75 days. It is now past 300 days. I have honored my commitment to Circuit City. I should be paid accordingly.

I do not have a declaration. As stated previously Eric Jonas as well as the Senior Leadership of Circuit City have personal knowledge of the awards as stated in Exhibit D.

Thomas C. Bradley

P.O Box 194

Clayton DE, 19938 (I have made numerous change of address requests to KCC LLC with no results)

804-332-0215 (Former address 2801 Savage View Drive Midlothian, VA 23112

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Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
----- x

**NOTICE OF DEBTORS' FIFTY-SIXTH OMNIBUS OBJECTION
TO CLAIMS (DISALLOWANCE OF CERTAIN ALLEGED ADMINISTRATIVE
EXPENSES ON ACCOUNT OF EMPLOYEE OBLIGATIONS)**

PLEASE TAKE NOTICE THAT the above-captioned Debtors (the "Debtors") filed the Debtors' Fifty-Sixth Omnibus Objection to Claims (Disallowance of Certain Alleged Administrative Expenses on Account of Employee Obligations) (the "Objection") with the Bankruptcy Court. A copy of the Objection is attached to this notice (this "Notice") as Exhibit 1. By the Objection, the Debtors are seeking to disallow certain claims.

PLEASE TAKE FURTHER NOTICE THAT on April 1, 2009, the Bankruptcy Court entered the Order Establishing Omnibus

Critical Information for Claimants
Choosing to File a Response to the Objection

Who Needs to File a Response: If you oppose the relief requested in the Objection and if you are unable to resolve the Objection with the Debtors before the deadline to respond, then you must file and serve a written response (the "Response") to the Objection in accordance with this Notice.

If you do not oppose the relief requested in the Objection, then you do not need to file a written Response to the Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is 4:00 p.m.
(Eastern Time) on November 16, 2009 (the "Response Deadline").

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is actually received on or before the Response Deadline by the Bankruptcy Court at the following address:

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street - Room 4000
Richmond, Virginia 23219

Your Response will be deemed timely served only if a copy of the Response is actually received on or before the Response Deadline by the Debtors' attorneys:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636 Attn: Gregg M. Galardi Attn: Ian S. Fredericks	MCGUIREWOODS LLP One James Center 901 E. Cary Street Richmond, VA 23219 Attn: Dion W. Hayes Attn: Douglas M. Foley
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- and -

- d. a copy of or identification of any other documentation or other evidence of the Claim, to the extent not already included with the Claim that the claimant presently intends to introduce into evidence in support of its Claim at the hearing; provided, however, that for a Response filed in support of a Claim arising out of a lease of real property, the Response need not attach such lease if the claimant indicates its willingness to provide such documentation upon request;
- e. a declaration of a person with personal knowledge of the relevant facts that support the Response; and
- f. the claimant's address, telephone number and facsimile number and/or the name, address, telephone number and facsimile number of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Address"). If a Response contains Notice Address that is different from the name and/or address listed on the Claim, the Notice Address will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Objection (including all Claims to be disallowed) and only for those Claims in the Objection.
- g. To the extent such person differs from the person identified pursuant to subsection e, above, the name, address, telephone number, facsimile number, and electronic mail address of the representative of the claimant (which representative may be the claimant's counsel) party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf (collectively, the "Additional Addresses"). Unless the Additional Addresses are the same as the Notice Addresses, the Additional Address will

Reservation of Rights. Nothing in this Notice or the Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you by the Debtors. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date on any grounds or bases. In such event, you will receive a separate notice of any such objections.

Dated: October 21, 2009
Richmond, Virginia

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